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IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION

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IN RE: ESTATE OF GERTRUDE WHITE, DECEASED
CASE NO: 1990-0826-05

PETITION TO FREEZE ESTATE DISTRIBUTION
AND MOTION TO COMPEL FORENSIC FINANCIAL AUDIT

NOW COMES the Petitioner, Marlo Beaman, by and through his designated legal counsel, and respectfully files this formal Objection and Petition to Freeze Estate Distribution against the appointed Administrator, Calvin White Jr., stating in support thereof as follows:

1. The primary Decedent, Gertrude White, passed away intestate on March 20, 1990, in Willow Grove, Montgomery County, Pennsylvania.

2. Under the Pennsylvania rules of intestate succession, the net proceeds of the estate were fully vested in her eight biological children at her exact time of death, granting each a 12.5% (1/8th) undivided equitable share.

3. The appointed Administrator, Calvin White Jr., willfully delayed opening a formal court probate administration for fifteen (15) consecutive years, choosing instead to handle estate assets, property maintenance, and financial accounts outside of judicial oversight.

4. Petitioner presents 'EXHIBIT B' into the official record—a private written admission from the Administrator dated March 18, 2006. In this correspondence, the Administrator explicitly concedes that the family deliberately withheld filing from the court under an unregulated 'family covenant' assuming all heirs would remain alive.

5. Petitioner notes that during this 15-year unmonitored intermission, multiple primary heirs passed away prior to receiving their lawful distributions, severely complicating the legal title chain and lineage asset tracking:
    a. Veronica M. Dinkins passed away on April 29, 2003.
    b. Dorothy Dinkins passed away on August 9, 2005.

6. Petitioner argues that the immediate proximity of Dorothy Dinkins' passing on August 9, 2005, directly triggered the Administrator's sudden, rushed filing of probate in October 2005, proving the court action was only initiated once internal family control of the assets began to fracture.

7. As a direct descendant and interested party, Petitioner asserts that the long-term, unmonitored co-mingling of estate funds, real estate upkeep costs, and informal account management outside court protection constitutes actionable fiduciary negligence.

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

a. Issue an immediate injunction freezing the $225,600.00 net pot inside the estate repository;

b. Halt all individual $28,200.00 cash distribution payouts to primary lines;

c. Order the Administrator to submit to a comprehensive, third-party forensic financial audit of all estate accounts tracking back to March 20, 1990.

Dated: March 24, 2006

Respectfully Submitted,

/s/ Legal Counsel for Petitioner

Attorneys at Law, Montco PA

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